

EXHIBIT E

CLARK, THOMAS & WINTERS

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June 25, 2007

VIA FACSIMILE

Andrew G. Finkelstein
Finkelstein & Partners, LLP
436 Robinson Avenue
Newburgh, NY 12550

RE: MDL No. 1629; *In Re: Neurontin Marketing, Sales Practices and Products Liability Litigation*; In the U.S. District Court for the District of Massachusetts.

This document relates to:

RUTH SMITH, Individually and as Widow for the use and benefit of herself and the next of kin of Richard Smith, Deceased.

Dear Andrew:

Following up on our prior discussions, the following is our proposed agreement regarding Plaintiff's May 21, 2007, list of additional potential witnesses (the "List"). It is my understanding that you have not yet determined which, if any, of these potential witnesses you will call to testify at the time of trial. Accordingly, in order to avoid the unnecessary time and expense of deposing all of the witnesses on the List, the parties have agreed that counsel for Plaintiff will notify counsel for Pfizer in writing, and no later than sixty (60) days before the fact discovery deadline, of the name(s) of the witness(es) on the List they intend to have testify at trial.

By entering into this agreement, Pfizer does not waive its right to depose any of the witnesses on the List - even if Plaintiff does not intend to have such witnesses testify at trial.

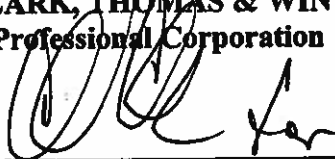
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June 19, 2007
Page 2

If you agree with the terms of this agreement, please sign below.

Sincerely,

CLARK, THOMAS & WINTERS
A Professional Corporation



Kenneth J. Ferguson
Attorney for Pfizer Inc

AGREED:

Andrew G. Finkelstein

C: Kelly Casey w/encl.

Via Email